

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT \_\_\_\_\_

FILED

2020 FEB 26 P 12:25

U.S. DISTRICT COURT  
EASTERN DIST. TENN.

DEPT. CLERK

Gabriel Xavier

Collins

(Enter above the NAME of the  
plaintiff in this action.)

v.

Sevier County  
Sheriff's Dept.

(Enter above the NAME of each  
defendant in this action.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS  
(42 U.S.C. Section 1983)

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? YES ( ) NO (✓)
- B. If your answer to A is YES, describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to the previous lawsuit:

Plaintiffs: \_\_\_\_\_

Defendants: \_\_\_\_\_

2. COURT: (If federal court, name the district; if state court, name the county):  
\_\_\_\_\_
3. DOCKET NUMBER: \_\_\_\_\_
4. Name of Judge to whom case was assigned: \_\_\_\_\_
5. Disposition: (For example: Was the case dismissed? Was it appealed? Is it still pending?) \_\_\_\_\_
6. Approximate date of filing lawsuit: \_\_\_\_\_
7. Approximate date of disposition: \_\_\_\_\_

II. PLACE OF PRESENT CONFINEMENT: Sevier County Jail

- A. Is there a prisoner grievance procedure in this institution? YES ( ) NO (✓)
- B. Did you present the facts relating to your complaint in the prisoner grievance procedure?  
YES ( ) NO (✓)
- C. If your answer is YES,
1. What steps did you take? \_\_\_\_\_  
\_\_\_\_\_
2. What was the result? \_\_\_\_\_  
\_\_\_\_\_
- D. If your answer to B is NO, explain why not. It happened  
before I got to the jail
- E. If there is no prison grievance procedure in the institution, did you complain to the prison authorities? YES (✓) NO ( )
- F. If your answer is YES,
1. What steps did you take? Told the CO's  
\_\_\_\_\_

2. What was the result? I was told to talk to a lawyer because there was nothing they could do.

### III. PARTIES

(In item A below, please your name in the first blank and place your present address in the second blank. Do the same for any additional plaintiffs.)

- A. Name of plaintiff: Gabriel Xavier Collins  
Present address: 137 Commerce St. Sevierville TN  
Permanent home address: 1124 Oak Cluster Dr. Apt. 7 Sevierville TN  
Address of nearest relative: 1124 Oak Cluster Dr. Apt. 7 Sevierville TN

(In item B below, place the FULL NAME of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use item C for the additional names, positions, and places of employment of any additional defendants.)

- B. Defendant: Johnathan Hays  
Official position: Sheriff Deputy  
Place of employment: Sevier County Sheriff's office  
C. Additional defendants: Dexter Robins, Sheriff Dept.  
Sevier County Sheriff's Department.

### IV. STATEMENT OF CLAIM

(State here as briefly as possible the FACTS of your case. Describe how EACH defendant is involved. Include also the names of other persons involved, dates and places. DO NOT give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets, if necessary.)

At the time of me being arrested  
at 7:00 a.m on Aug 13, 2019 I

Was already in handcuffs and Detained when Officer Dexter Robins and Johnathan Hays picked me up off of my feet and then slammed me on my face at an angle causing my neck to fracture in two places C-5 and C-6. Afterwards I was trying to tell them that my neck and right arm was really hurt and to please grab my left arm and let go of my right. They ignored me and yanked me up by my right arm and my feet and carried me out the building while hitting my head on the doorways. I was taken to the hospital right after. Incident is on body camera footage.

Witnesses are Jimara Martin

Autmn Allen

Taylor Grace

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Stephanie Welch

I also have unpaid Medical Bills due to this

V. RELIEF

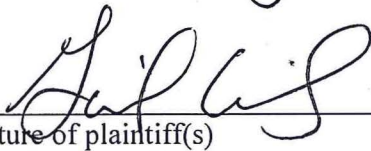
(State BRIEFLY exactly what you want this Court to do for you. Make NO legal arguments.

Cite NO cases or statutes.)

I would like to sue the Sherriff  
Departmen for \$3,000,000 (three million)  
plus Medical expenses

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of  
my (our) information, knowledge and belief.

Signed this 24<sup>th</sup> day of February, 20 20.

  
Signature of plaintiff(s)